

# EXHIBIT E

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MARGARET CRAIG, as next of )  
kin and personal )  
representative of the estate )  
of Angela Hulsey, )  
Plaintiff, )  
vs. ) No. 3:17-cv-01335  
CHEATHAM COUNTY, TENNESSEE, ) JURY DEMAND  
BEN MOORE, MARK BRYANT, ) JUDGE CAMPBELL  
STEPHANIE GIZZI-BELL, JESSICA ) MAGISTRATE HOLMES  
PLANK, et al., )  
Defendants. )

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**The Deposition of**  
**HARLEY DESTINY ALEXXIS DURHAM**  
**January 14, 2019**

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Accurate Court Reporting  
The Pilcher Building  
P.O. Box 682683  
Franklin, TN 37068  
(615) 244-DEPO or 244-3376  
www.ACR-Nashville.com

1           brought in after she was arrested?

2           A.     Yes, sir.

3           Q.     Okay. And your observation was that it looked  
4 like she had lost a lot of weight?

5           A.     Yes, sir.

6           Q.     Anything else?

7           A.     That was it.

8           Q.     Did you have any direct interaction with her  
9 at that time?

10          A.     Not that I can remember.

11          Q.     And I think you told us earlier you personally  
12 did not conduct her intake?

13          A.     Correct.

14          Q.     Were you on break at the time?

15          A.     My shift hadn't started yet.

16          Q.     So you were waiting to start your shift?

17          A.     Yes, sir.

18          Q.     Okay. What is your next recollection of any  
19 interaction you had with Ms. Hulsey after that?

20          A.     Just her asking for her vitals to be checked  
21 the night that she was brought up to booking on medical  
22 watch on my shift. She had told me that she wasn't  
23 feeling well, but then had stated that she didn't do  
24 good with staying sober.

25                   When she asked me to take her vitals, I said I

1 would. When I came back to take her vitals, I was also  
2 passing out medication and doing a head count and  
3 security check.

4 Q. And I think I heard you say something about  
5 "booking," and so let me make sure. Do you recall  
6 relative to -- October 6th, I think, was date that she  
7 got booked. Do you recall relative to October 6th when  
8 this encounter took place?

9 A. That was the night, I think, of the 11th.

10 Q. All right. You don't recall any other  
11 interaction with Ms. Hulsey from October 6th through the  
12 10th?

13 A. I do not.

14 Q. Okay. So on the 11th is when she asked you  
15 for her vitals to be taken?

16 A. Yes, sir.

17 Q. And she told you she was not feeling well?

18 A. Correct.

19 Q. Did she ever use the phrase "I feel like I'm  
20 dying"?

21 A. No, sir.

22 Q. And at the time that this was going on, you  
23 were doing head count and med pass?

24 A. And security check.

25 Q. And security check. And so did you do -- take

1 her vitals?

2       A. At this time, she was -- I had her sit across  
3 from me at the table, and she did so. And when I began  
4 to do -- to take her vitals, she had what appeared to me  
5 as a seizure. I had reached over and grabbed her by the  
6 front of her oranges to prevent her from falling and  
7 hurting herself. I wasn't really in the position to be  
8 able to go around the table in time to be able to like  
9 take her to the floor, so...

10     Q. Ease her to the floor, I assume?

11     A. Sorry. Sorry. But I do recall that an inmate  
12 did come over and assist me with it.

13     Q. Do you remember who that was, that other  
14 inmate?

15     A. I do not recall.

16     Q. Do you remember if Tia Newman was involved in  
17 that incident?

18     A. I don't remember if it was Tia Newman.

19     Q. Do you know Tia Newman?

20     A. I do.

21     Q. What about Deanna Brisco?

22     A. I don't recall if she was the one to assist  
23 me.

24     Q. Okay. But there was some inmate that  
25 assisted?

1 A. Yes.

2 Q. And the reason I was talking about "taking her  
3 to the floor," in a correctional setting, I was  
4 thinking --

5 A. Right.

6 Q. -- you know, going hands-on and maybe having  
7 to restrain somebody.

8 A. No, no.

9 Q. This was not a use of --

10 A. No. This was ease her to the floor so she  
11 wouldn't hurt herself.

12 Q. But not a use-of-force situation?

13 A. No, sir.

14 Q. Okay. Did you have to grab an ammonia  
15 capsule?

16 A. I did not have the opportunity to as I was in  
17 Big Dorm with her and the ammonia capsules are in  
18 booking.

19 Q. That was my next question. I wanted to make  
20 sure where this was, but this was in Big Dorm?

21 A. Yes, sir.

22 Q. Okay. So you grabbed her. Another inmate  
23 assists. Do you get her to the floor? What happens  
24 then?

25 A. We were able to ease her to the floor so she

1 can finish her seizure. We had then moved her to her  
2 bunk, which was just mat in a plastic "boat," as we  
3 called them. And by this point, I had radioed for Mark  
4 Bryant to come back to the dorm.

5 Q. And was he your supervisor?

6 A. Yes, sir.

7 Q. Did you have any other supervisor on that  
8 shift?

9 A. Mark, our corporal. Roger Temple was the  
10 sergeant. And I think at that time, Josh Marriott was  
11 the FTO.

12 Q. All right. So did she get moved back to the  
13 bunk prior to Mark Bryant arriving?

14 A. Yes. We were able to move her there safely.

15 Q. Did you complete her vitals?

16 A. I was not able to complete her vitals.

17 Q. Did you get any of her vitals?

18 A. I did not. They would not read -- the blood  
19 pressure wouldn't read on them.

20 Q. What about the pulse ox; did you try that?

21 A. I don't remember.

22 Q. And do you recall if you took her temperature?

23 A. No, sir.

24 Q. You don't recall or you --

25 A. I don't recall.

1           Q.     So tell me what happened once Mark Bryant got  
2 back there.

3           A.     When he came back, I was still next to  
4 Ms. Hulsey, and I had explained to him that she had what  
5 appeared to me was a seizure, what had happened. We had  
6 moved her back to her bunk. And by this point, he was  
7 trying to speak with her, but her tongue was out, and so  
8 she was trying to talk around it. He had asked her why  
9 her tongue was out, just so he would have, I would  
10 assume, a better understanding of what had happened.

11          Q.     All right. And so she had difficulty speaking  
12 because her tongue was out --

13          A.     Yes, sir.

14          Q.     -- following the seizure?

15          A.     Yes, sir.

16          Q.     She didn't have her tongue out before the  
17 seizure, I take it?

18          A.     Correct.

19          Q.     Okay. Did she have any difficulty explaining  
20 to you that she wasn't feeling good before the seizure?

21          A.     No, sir. She was able to speak clearly.

22          Q.     Could you make any other observations about  
23 her condition other than her verbally telling you that  
24 she didn't feel well?

25          A.     Her just being shaky.

1           Q. All right. And you weren't able to get her  
2 temperature. Do you know whether or not she felt hot or  
3 felt cool?

4           A. I do not -- I do not remember. I'm sorry.

5           Q. Do you know if she appeared to be weak at all?

6           A. She appeared weak.

7           Q. Do you know if she was sweating at all?

8           A. I don't remember.

9           Q. I know we had a lot of reports of her having  
10 bowel movements. Do you know if at that time she had  
11 experienced a bowel movement?

12          A. No, not that I can remember. Not at that  
13 time.

14          Q. All right. So after -- going back to Mark  
15 Bryant is there, her tongue is out, and she's having  
16 trouble talking because her tongue is out. He says,  
17 "Why is your tongue out?" What happened after that?

18          A. He tried asking her more questions, but by  
19 this point, we both knew that we needed to contact the  
20 nurse. So we had her lay back down on her mat.

21           Mark went to booking to contact the nurse. I  
22 felt comfortable enough that I can go -- I was able to  
23 leave her there because she was still coherent. She was  
24 laying down so she would not be able, if she did have  
25 another seizure, to fall and hurt herself.

**CHEATHAM COUNTY SHERIFF'S OFFICE**  
**Jail Management - Intake Report**

Agency      CHEATHAM      Booking #    161006-0062      Arrest #

Intake Date    10/6/2016      Intake Time    13:12

**Arrestee**

Name	HULSEY, ANGELA DENISE		
Address	1915 HIGHWAY 12 NORTH ASHLAND CITY TN 37015		
Phone	.615-981-1014	Sex	F
DOB	03/03/1982 (34)	Race	W
SSN	*****6721	Ethnic.	N
DL	091975203 TN	Height	5'02"
FBI		Weight	120
JRN	1610060062	Hair	BRO
DOC		Eyes	BRO
SID			MID



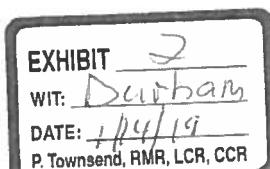
**Other**

Bias Description	NONE (NO BIAS)		Attorney
Housing Facility	FEMALE DORM		Cash      \$0.00
Cell	4 - MISDEMEANOR NON-SENTENCE		
Arrest Location	CHEATHAM		
Offense Location	CHEATHAM		
Property Location			

**Questions**

Number	02	Category	BOOKING	Answer
Question	WHAT IS YOUR PLACE OF BIRTH?			Answer Desc. NASHVILLE TN
Number	04	Category	BOOKING	Answer N
Question	ARE YOU REQUIRED BY LAW TO REGISTER AS A SEX OFFENDER?			Answer Desc.
Number	03	Category	BOOKING	Answer Y
Question	ARE YOU A CITIZEN OF THE UNITED STATES?			Answer Desc.
Number	01	Category	BOOKING	Answer Y
Question	WERE YOU GIVEN THE OPPORTUNITY TO USE THE PHONE?			Answer Desc. 10/07/2016 2152 BR 10/08/2016 @ 1338 JP 10/09/2016 @ 0945 DRH USED 5MIN 10-09-16 @ 1510 JK
Number	05	Category	MEDICAL	Answer N
Question	ARE YOU TAKING MEDICATION AT THIS TIME? IF YES, WHAT KIND, HOW MUCH AND WHEN? WHO IS YOUR DOCTOR?			Answer Desc.

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HULSEY 0047

Number	06	Category MEDICAL	Answer Y
Question	DO YOU HAVE ANY INJURIES AND/OR ILLNESS THAT NEED TREATMENT AT THIS TIME? IF YES, WHAT FOR?		Answer Desc. FLUID IN LEFT KNEE AND LEG <i>(Handwritten circle with checkmark)</i>
Number	07	Category MEDICAL	Answer N
Question	DO YOU HAVE SEIZURES?		Answer Desc.
Number	08	Category MEDICAL	Answer N
Question	ARE YOU A DIABETIC?		Answer Desc.
Number	09	Category MEDICAL	Answer N
Question	LIST ANY MEDICATIONS IN PRISONERS POSSESSION AT TIME OF BOOKING.		Answer Desc.
Number	10	Category MEDICAL	Answer N
Question	HAVE YOU TAKEN ANY DRUGS IN THE LAST 24 HOURS? IF YES, WHAT KIND, HOW MUCH, AND WHEN?		Answer Desc.
Number	11	Category MEDICAL	Answer N
Question	HAVE YOU ATTEMPTED SUICIDE IN THE LAST 24 HOURS? IF YES, WHAT METHOD?		Answer Desc.
Number	12	Category MEDICAL	Answer
Question	IF YES TO ANY OF THESE QUESTIONS, CALL NURSE.		Answer Desc.
Number	13	Category MEDICAL	Answer
Question	SIGN HERE TO CERTIFY THE INFORMATION GIVEN AT BOOKING		Answer Desc.
Number	14	Category MEDICAL	Answer Y
Question	DO YOU HAVE HEALTH/MEDICAL INSURANCE? (ADD PHOTO OF INSURANCE CARD TO MEDIA)		Answer Desc. TENN CARE
Number	15	Category MEDICAL	Answer
Question	IF SO WHO IS THE PROVIDER? POLICY #? AND PHONE NUMBER?		Answer Desc.

*10/12/16 Jf*